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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Regulatory Reform for Local Exchange	)	CC Docket No. 92-135
Carriers Subject to Rate of Return	)	
Regulation	)	

REPLY COMMENTS OF THE

NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

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SUMMARY

NTCA submits these Reply Comments in response to the comments filed on August 28, 1992, regarding the Commission's examination of proposed regulatory changes for the treatment of small and mid-sized LECs. Over twenty parties submitted comments in this proceeding with an overwhelming majority in general agreement with the direction the Commission is taking to reform its rules. Nearly all commenting parties present positions which are compatible with the views taken by NTCA in its Comments.

The small LEC industry takes issue with some of the implicit assumptions contained in current incentive regulation proposals. First, several commenting parties emphasize that small LECs are already efficient and productive, are fully committed to providing high quality service, and will continue to deploy modern technological developments in that service provision. Small LECs do not want to see regulatory reform lead to pressures which force telcos to degrade service.

The parties also agree that there are a large number of conditions that are expected to persist for the foreseeable future which could make mandated incentive plans counter-productive in their current forms. Demand variance, lower than average growth, the cost to comply with network imposed plant upgrades, bypass, and regulatory policy uncertainty can lead to revenue reductions or cost recovery risks which could harm small LECs' ability to bring quality service to their subscribers. For these reasons, incentive regulation plans must remain optional.

NTCA supports the recommendations of NECA regarding baseline regulation reform. LECs and NECA must retain the ability to file rates based on projected data. Tariff filing procedures for new and *de minimis* existing services should be streamlined. Also, rate flexibility should be extended to baseline carriers. The Commission should adopt NECA's rule suggestions which will facilitate the development of an optional incentive-based plan for the pools. Finally, the eligibility criteria for receiving settlements from the NECA pools based on Interstate Average Schedules should be modified as suggested by NECA.

Contrary to the Commission's tentative direction, the commenting parties agree that a small non-incentive plan LEC should be allowed to return an acquired or merged property to non-incentive status without having to pursue a waiver.

Finally, this proceeding points to the need for a regulatory flexibility analysis with respect to the Commission's rules and regulations. Accordingly, NTCA asks for a more comprehensive review of the need for and the areas within the Commission's rules where regulatory burdens on small LECs can be reduced.

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Regulatory Reform for Local Exchange Carriers Subject to Rate of Return Regulation	)))	CC Docket No. 92-135

REPLY COMMENTS OF THE
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

The National Telephone Cooperative Association ("NTCA") submits these Reply Comments in response to the comments filed on August 28, 1992, in the above-captioned proceeding.[1] This proceeding is examining possible changes in the regulatory treatment of interstate access services provided by the small and mid-sized local exchange carriers ("LECs") that are not subject to the price-cap rules applied to the largest LECs. NTCA is a national association of approximately 480 small and rural LECs providing telecommunications services to interexchange carriers ("IXCs") and subscribers across rural America.

I. INTRODUCTION

In its Comments, NTCA praised the Commission for its commitment to explore ways in which regulation can be modified to accommodate the changing communications industry. Regulatory reforms are particularly needed to accommodate the unique operating characteristics of small and rural LECs. NTCA noted the need to reverse the trend of the last decade during which

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[1] Notice of Proposed Rulemaking in CC Docket No. 92-135 released July 17, 1992 ("NPRM").

time small LECs have become increasingly burdened by regulation. Accordingly, NTCA urged the Commission to consider more substantial streamlining of the regulatory treatment of small LECs similar to the approaches adopted by many states.

NTCA stressed that the strong dependence on access services demand growth to gauge productivity, a provision that is part of most of the current incentive proposals, makes these plans unsuitable to many small LECs, and therefore, the regulatory plans must remain optional. Furthermore, NTCA observed that current forms of regulation do not necessarily promote efficiency disincentives that need to be remedied. Small and rural LECs already have sufficient incentives to operate efficiently and to provide quality service to subscribers and IXCs.

NTCA submitted several specific recommendations for steps the Commission should take, at this point in time, to reform the regulatory treatment of the smallest LECs. NTCA supported the introduction of the "Optional Incentive Regulation" ("OIR") plan, with minor modifications, as an option for LECs. NTCA also supported the expansion of the Section 61.39 small-LEC tariff filing rules to include common line rates.

Of most importance to NTCA member LECs, NTCA urged the Commission to adopt a more flexible approach for the treatment of carriers remaining under "baseline" regulation either individually or within the pools administered by the National Exchange Carrier Association ("NECA"). NTCA did not support requirements which would require rates to be calculated based upon historical information because such a requirement would be more restrictive than current methods and could, if adopted, jeopardize small LECs' ability to recover their costs. NTCA suggested that the administrative rules streamlined under the OIR plan proposal, under which tariff filings are made, should also be extended to baseline carriers. Finally, a degree of pricing flexibility, as proposed for the OIR plan, should also be available to traditional rate of return carriers and NECA pools.

Almost all of the parties that filed initial comments in this proceeding present views that are compatible with NTCA's positions. The overwhelming support for the Commission's general regulatory reform direction, together with the lack of any strong objection to this direction, provides clear justification and need for the Commission to move forward with its reform proposals.

II. SMALL LECs ARE ALREADY EFFICIENT AND PRODUCTIVE WHILE AT THE SAME TIME COMMITTED TO PROVIDING QUALITY SERVICE USING MODERN TECHNOLOGICAL DEVELOPMENTS.

Several commenting parties agree that local ownership and control already creates effective incentives for small LECs to seek the proper balance between service quality and cost.[2] As NTCA did, OPASTCO disagrees with the implicit assumption underlying the Commission's incentive proposals that the small and mid-sized LECs for which the proposals are designed are

[2] NTCA at 7-9. Unless otherwise indicated, all citations herein refer to comments filed on August 28, 1992, in this proceeding.

"inefficient, ineffectual, and archaic."[3] OPASTCO also points to the evidence that small and rural LECs "have a proud history of serving their areas with the highest quality service at the most reasonable rates."[4]

OPASTCO refers to already healthy incentives for small and rural LECs to invest in technological innovations and their networks because "they are investing in themselves, their neighbors, and their communities."[5]

PTI Communications echoes this sentiment by stating "[l]ike that of its industry counterparts, PTIC's mission is to provide high quality and affordable, local telephone service to its subscribers."[6] The Small Business Administration also lauds small LECs' operating excellence because "[t]he vast majority of small LECs are well-run, extremely efficient providers of sophisticated telecommunications services."[7]

The current record shows that rate of return regulation can produce a productive and efficient operating environment for small LECs which benefits the subscribers served in rural America and leads to advanced network design that benefits all the telecommunications network and service providers. In any debate

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3 OPASTCO at 3.

4 Id. at 3-5.

5 Id. at 4.

6 PTI Communications at 2, footnote omitted.

7 Chief Counsel, Office of Advocacy, United States Small Business Administration ("SBA") at 8.

over which is the greater evil, controlling costs or providing reasonably high quality service, NTCA is certain that the vast majority of its members will continue to opt in favor of the balance they have achieved today. No member LEC wants regulatory reform to lead to harmful pressures which makes service degradation necessary.

III. THE PARTIES AGREE THAT THE CONDITIONS UNDER WHICH SMALL LECs WILL OPERATE OVER THE NEXT SEVERAL YEARS ARE NOT COMPATIBLE WITH MANDATED INCENTIVE REGULATION, AT LEAST UNDER THE CURRENTLY PROPOSED FRAMEWORKS.

In its Comments, NTCA stressed that incentive regulatory proposals must remain optional if these plans apply rate limits which depend heavily on expected increases in access service demand.[8] Small LECs are at extraordinary risk of unpredictable variance in demand from year to year or lower than industry average growth which can affect the application of incentive plans and LECs' cost recovery but has little or nothing to do with efficiency or productivity.[9] Furthermore, the averaged or frozen cost/demand indices, used to constrain access rates and consequently cost recovery as many incentive-based plans employ, are not representative of the small geographic areas that NTCA member LECs serve.[10]

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[8] NTCA at 3-7.

[9] Id.

[10] Id.

Several commenting parties agree that currently designed incentive plans are unsuitable for many small LECs.[11] While NTCA stressed the demand denominator as the greatest risk to small LECs in applying indices, other parties emphasized that the cost numerator is just as onerous.[12] ITAG observes that:

> a number of technological, market, and regulatory forces are likely to drive up small and mid-sized LECs' costs over the next few years -- forces which are largely outside the LECs' control and unlikely to be counterbalanced by any above-normal demand growth or traditional cost-cutting measures.[13]

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[11] ALLTEL at 1-2 ("These factors limit the economies of scale and scope associated with larger companies."); Fred Williamson & Associates, Inc. ("FW&A") at 1-2 ("[T]he current proposal does not offer sufficient incentives of price/cost efficiencies by which the smallest LECs might participate . . . ."); Independent Telephone Access Group ("ITAG") at 3-6 ("These benefits [of incentive regulation] will only be achieved, however, if the anticipated cost savings can be realized and demand grows at stable or above-normal rates. In the absence of these conditions, companies are likely to be consistently unable to achieve their authorized rate of return, unless frequent midcourse rate corrections are permitted."); NECA at 6 ("While history may provide some insight into the general trend of costs, it does not recognize the rapidly changing technology that NECA pool members are incorporating into their networks . . . ."); OPASTCO at 6-8 ("The initial risk is the one of being a small business."); PTI Communications at 2-3 ("When evaluating the price cap rules, it appeared that an inordinate amount of risk would have to be shouldered, by small and mid-sized companies, without the corresponding incentive or reward."); and SBA at 11 ("certain circumstances often are beyond the control of the LEC.").

[12] NTCA did note that the cost numerator is not entirely within the control of the LEC. NTCA at n.2.

[13] ITAG at 4. ITAG notes 800 database implementation, equal access, North American Number Plan changes, circuit diversity, expansion of extended area service ("EAS"), local service evolution, customer demand for sophisticated services, and state regulatory burdens. Id.

Revenues based on frozen or index-restricted rates can also be jeopardized by other events outside the control of small LECs. Demand for interstate services is not expected to grow at comparable levels to those of recent years because the greatest reduction in long distance rates are now behind us.[14] Increased competition from a variety of alternative providers and bypass losses have the potential to erode revenues.[15] SBA notes regulatory proceedings which can transform the industry and weather-related occurrences that can lead to revenue reductions.[16]

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[14] ITAG at 5.

[15] Id. at 5-6.

[16] SBA at 11-12. In recent years, one of the greatest risks to small LECs is the uncertainty over regulatory rules and Commission policy. In several matters, the industry has had to operate without clear regulatory direction or has been informed after many years that rules applications are incorrect. See, e.g., Petition for Declaratory Ruling filed by NECA on March 8, 1991; Comments filed by NTCA on April 19, 1991 and May 7, 1991, regarding the procedures for allocation of Other Billing and Collection expenses. See, also, Letter to Kenneth P. Moran, Chief - Accounting and Audits Division of the Federal Communications Commission from William E. Stern, V.P. - Tariff Cost and Regulatory Matters dated November 1, 1991; Responsible Accounting Officer Letter No. 21 Revised, DA 92-1091, released by the Chief of the Accounting and Audits Division on August 7, 1992; Responsible Accounting Officer Letter No. 21, DA 92-1225, released by the Chief of the Accounting and Audits Division on September 8, 1992; Petition for Reconsideration and/or Clarification filed by NTCA on September 8, 1992 in DA 92-1091, all regarding remote and concentrator classification. See, also, Responsible Accounting Officer Letter No. 20, DA 92-520, released by the Chief of the Accounting and Audits Division on May 4, 1992, regarding direct assignment for jurisdictional allocation purposes. After long periods of rule application or delays in clarification, LECs have been ordered to change cost allocation and recovery abruptly, without public notice, comment, or discussion of public policy objectives.

For a variety of reasons, the incentive-based plans as have been proposed to date, may not be effectively applicable to small LECs' operations. As OPASTCO states: "Rate of return regulation has ensured that the small rural LECs can bring better service to their customers." And NTCA maintains that this reality will remain valid for the foreseeable future. For these reasons, incentive regulation plans must remain optional.

IV. COMMENTS ON SPECIFIC REGULATORY REFORM PROPOSALS.

A. REFORM AND FLEXIBILITY FOR BASELINE REGULATION.

NTCA submitted that tariff rate filings should not be required to be based solely on historical cost and demand data because to do so would be more restrictive than the procedures available today.[17] NTCA concurs with the comments of NECA that provide substantive evidence showing that historical or year-over-year, growth-trended data methods do not yield compensatory access rates.[18] In these changing times, LECs and NECA need to retain the flexibility to make rate filings based on prospective revenue requirements and access demand.

Similarly, NTCA supports NECA's recommendation with respect to the rate calculation mechanics for the introduction of new services in addition to extending these mechanics to existing de minimis access services.[19] NECA's suggestions for streamlining

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[17] Many commenting parties agree: NECA at 5-9; SBA at 20-21; ITAG at 10; Tallon, Cheeseman and Associates, Inc. ("TCA") at 11-13; and John Staurulakis, Inc. ("JSI") at 13-14.

[18] NECA at 5-9.

[19] NECA at 9-12.

the introduction of new services and extending the provisions to rate elements which fall under the two percent revenue threshold are in the public interest.[20] NECA proposes a ratio method to set initial rates for new services based on the rates of larger, price-cap LECs.[21] NECA's ratio method is analogous to the indexing approach that NTCA described in its comments and should be adopted.[22] NTCA also supports NECA's suggestions with respect to tariff filing cost support requirements for rate elements under the two percent level.[23] These changes would result in the reduction of needless regulatory burdens for NECA and the pooling LECs.

Finally, NTCA concurs in the statements and recommendations offered by NECA on the need for rate flexibility to be extended to baseline carriers.[24]

B. AN INCENTIVE-BASED PLAN FOR THE NECA POOLS.

While expected to be a difficult process, NTCA reasoned that NECA should, nevertheless, be given an opportunity to develop an incentive-based plan for the pool.[25] Rather than the Commission dictate the form of any such plan, NTCA recommended that NECA be

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[20] Several other parties have similar suggestions: FW&A at 3-4; TCA at 13; JSI at 6-8; and GVNW, Inc./Management ("GVNW") at 3-4.

[21] NECA at 11.

[22] NTCA at 10-12.

[23] Id. at 12.

[24] NECA at 12-14.

[25] NTCA at 13-14.

given the freedom to develop its own plan for the pooled revenues distribution side of the pools.[26] NECA proposes a rule which it believes "will encourage further efforts in formulating such plans."[27] Consistent with NTCA's position, the Commission should adopt the rule suggestions of NECA as a first step in this process.[28]

C. INTERSTATE AVERAGE SCHEDULE SETTLEMENTS ELIGIBILITY.

Interstate Average Schedules are useful to many small LECs and contain features that provide incentives for LECs to control costs, and therefore, NTCA has supported their continued availability. In this proceeding, NTCA asked the Commission to consider criteria under which more small telcos could make use of Interstate Average Schedules.[29] NECA has provided a set of attributes for companies to be allowed to convert to Schedules, a timetable for that conversion, and the mechanics for an ongoing election process.[30] NECA has obviously studied the dynamics of allowing LECs to convert and its proposal represents an

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[26] Id.

[27] NECA at 16.

[28] Some commenting parties caution, however, that an incentive plan within the pool must also remain optional for many of the same reasons as individually applied incentive plans. See, ITAG at 10; FW&A at 4.

[29] NTCA at 14.

[30] NECA at 16-20.

appropriate balance of the issues. NTCA has revised NECA's proposal and concludes that it should be adopted.[31]

D. MERGER AND ACQUISITION PROVISIONS.

NTCA explained how the merger and acquisition rules should apply to situations where small non-incentive plan LECs acquire incentive plan carriers or portions of one of these carriers.[32] The non-incentive plan LEC should be allowed to return the acquired or merged property to non-incentive status without having to pursue the burdensome process of obtaining a waiver of

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[31] Ronan Telephone Company ("Ronan") proposes an optional incentive plan for average schedule companies. Ronan at 2-4. Ronan's optional incentive proposal suffers from a circularity problem in that it suggests that NECA "would no longer need to prepare, file and defend annual revisions to the average schedule formulas . . ." but Ronan and potentially other LECs under its proposal would "target their rates at each biennial filing to reflect the average schedule pool settlement the carrier would have received if the carrier had continued to participate in the NECA pool." Ronan at 3-4. Ronan is free to cut its costs under the actual Average Schedules settlement system. It would appear that Ronan's objective is to avoid interaction with NECA, but from what companies is NECA supposed to acquire data to calculate the hypothetical average schedule settlement LECs would have received if they had remained an average schedule company. Pricing flexibility may be the only benefit of Ronan's proposal. NTCA does not favor threatening the strength of interstate average schedules just to afford individual companies rate flexibility. Furthermore, NTCA does not support the changes in Long Term Support proposed by Ronan. Ronan at 5-7. Finally, Ronan's unexplained theory that the operation of Section 69.606 of the Commission's rules results in "perverse incentives to inflate rate bases. . ." is simply wrong and does not fit the facts. Ronan at 3 and 8.

[32] NTCA at 14-16.

the Commission's rules. The parties addressing this issue agree.[33]

V. THE COMMISSION SHOULD CONDUCT A COMPREHENSIVE REGULATORY FLEXIBILITY ANALYSIS ON ALL ITS RULES AND REGULATIONS AS APPLIED TO SMALL LECs.

The Office of Advocacy of the Small Business Administration correctly points out that the Commission's rational for refusing to perform a regulatory flexibility analysis is invalid.[34] NTCA has pointed out in many previous proceedings that the question of "dominance" for determining what is a "small business" for purposes of the Regulatory Flexibility Act is unrelated to the determination of dominance used by the Commission in applying common carrier regulation.[35] The Regulatory Flexibility Act is the responsibility of the Small Business Administration; the Commission should defer to its definition of what is a small business.

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[33] OPASTCO at 9-10 ("One additional, unwarranted administrative burden is the one associated with mergers and acquisitions."); SBA at 23-24 ("While the FCC's attempts to reduce the regulatory burdens are admirable, its treatment of exchange acquisition is anomalous."); and JSI at 14-15.

[34] Small Business Administration Comments at 25.

[35] See, e.g., Comments in CC Docket No. 86-111 (filed June 30, 1986) and Comments and Reply Comments of NTCA and the Organizational for the Protection and Advancement of Small Telephone Companies ("OPASTCO"), CC Docket No. 78-196 (filed May 3, 1985 and July 3, 1985, respectively); Comments and Reply Comments of NTCA and OPASTCO, CC Docket No. 85-229 (filed November 13, 1985, and January 21, 1986, respectively); and Comments of NTCA and the National Rural Telecom Association regarding the Petition to Reduce Administrative and Regulatory Burdens on Small Telephone Companies filed by the United States Telephone Association (filed March 31, 1986).

VI. CONCLUSION

NTCA urges the Commission to adopt changes consistent with its initial comments and this reply.

Respectfully submitted,

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<u>CERTIFICATE OF SERVICE</u>

I, Rita H. Bolden, certify that a copy of the foregoing Reply Comments of the National Telephone Cooperative Association in CC Docket No. 92-135 was served on this 28th day of September 1992, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list.

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